2-1996

Practicing CPA, vol. 20 no. 2, February 1996

American Institute of Certified Public Accountants (AICPA)

The Practicing CPA

FEBRUARY 1996

Published for All Local and Regional Firms by the AICPA Private Companies Practice Section

BUILDING A WORKFORCE FOR THE FUTURE

Seventy percent of the cost of operating our firm is people cost. More than 60 percent of our annual net earnings are generated between January 1st and April 15th. It is the same story of peaks and valleys in the workload at many CPA firms. Obtaining more work to fill the valleys and balance the workload with the workforce is difficult. So, we have taken the opposite approach at Clifton, Gunderson & Co., and are trying to structure a workforce that is compatible with our charge-hour calendar.

Currently, over 25 percent of our personnel have some type of part-time or flexible work arrangement, and we expect this number will increase to 35 percent by the year 2000. Such change in the culture of a firm is not achieved quickly. It is an ongoing process requiring an overall plan and the commitment of partners and managers to executing it.

We began by asking each office to design the "ideal" staff structure to reflect the maximum number of charge hours that could be sold each month—the goal being the perfect staff/workload fit. We are in the process of trying to make that ideal structure a reality. We know this will never be 100 percent attainable because of constant workload changes and the need to have people available all the time. Nevertheless, implementation of the following programs has helped us make impressive progress.

Professional staffing programs

We have recruited on campus since the early days of building our firm. At first, we were not successful, so we organized some student focus groups to find out why. We discovered that students at the large accounting schools where we were recruiting were focused on joining a large firm, and that many only expected to stay in public accounting two to three years. They did not think it realistic to expect them to stay at a firm longer than that.

Now we cannot afford to hire people, train them for two or three years, and then have them leave. We determined that we were more likely to find the type of person we want by recruiting at the smaller schools and universities in our practice areas.

Over the years, we have developed a profile of the type of person who should be successful at Clifton, Gunderson & Co. The profile shows that if the person were an older student or has a farming background, he or she will stay with us longer and have the work ethic we want. So, now we look for older students, for example people who have gone back to school after losing a job or who have worked their way through school, and for people with prior work experience.

An internship program is a great way to find out whether a student is the type of person you want to hire. We try to have at least one intern in every office. They make friends with the rest of the staff, learn the nature of the work and about our firm. The program has enabled us to identify and hire

What's Inside . . .

bright, promising staff members who will stay with us.

Part-time arrangements are made according to the needs of individual offices. In every one of our offices (typically twenty-five people), there may be seven or eight different ways people's jobs are structured and at least five different ways they are paid. To avoid jealousies and problems, it is essential to let everyone know about the arrangements and that there is no set pay plan.

People with part-time schedules include partners, supervisors, managers, and accounting services staff. Someone's job might be to manage a fixed number of audits during the busy season or to provide bookkeeping services to a limited number of clients at the clients' convenience. These arrangements complicate scheduling, so there is a trade off. But when 70 percent of the cost of operating your firm is labor cost, any reduction in that cost drops to the bottom line.

Part-time staff can maintain client contact even when they are not in the office and can still participate in marketing activities. They live in the community, are members of country clubs, and engage in civic and social activities. They are every bit as much involved in the community as full-time staff.

Currently, we employ about seventy-five paraprofessionals in the audit and tax areas. Many of them have associates degrees from community colleges and like this type of work. They are highly efficient.

Another program enables staff members to work for Clifton, Gunderson & Co. only when school is in session (a teacher's contract). This means they don't work in the summer and get all school holidays off.

This arrangement lines up with our workload pretty well. The staff (predominantly female) receive full medical insurance and other benefits and still have that level of flexibility. We even adjust for those who cannot travel out of town because of family needs. We do this, not out of the goodness of our hearts, but because it makes sense economically to have these types of arrangements.

Our part-time seasonal employment program is effective because the same people return to us year after year. Someone who works in tax compliance, for example, might do the same tax returns every year. The job might be to do 100 returns, from the interview stage all the way to the return partner sign-off. If we had to retrain a new group every year, the program would not be effective.

Part-time staff have to meet minimum CPE requirements, so there is a little extra cost from that standpoint. But, in some cases, we pay part-time staff members for charge hours only (those in accounting services are 97 percent chargeable) and bill them for three times the amount.

We use community newspapers to recruit part-time staff and also have a recruiting referral reward system in which current staff receive $1,000 if the recruit remains with the firm for one year. Jobs are posted and members of our firm call someone they know from chapter meetings and school, or who is a neighbor, and sell the firm to this person. The program is so effective it is now a firm policy.

Anytime there is a position in the firm that might be an upgrade, it is posted on the bulletin board. We don't transfer staff much because of the expense (average cost is $30,000 to $40,000, mainly because of housing) and because people prefer to work in the towns where they are currently living.

Partners and managers sometimes transfer when the firm has a specific need. For example, the firm might try to persuade someone with partner potential to move to another office if a partner is retiring and there is no partner candidate at that office. Such a request might offer a quicker than usual route to partnership, and people will move for that opportunity.

Some of our offices close at noon each Friday from Memorial Day to Labor Day to give everyone a longer weekend. At other offices, 50 percent of the staff works Monday through Thursday in the summer while the rest of the staff works Tuesday through Friday. Staff love these programs. Clients are familiar with the routine and can always reach somebody. These are general rules. If the situation demands it, everybody has to work on what the client needs.

(continued on page 7)

The Practicing CPA (ISSN 0885-6931), February 1996, Volume 20, Number 2. Publication and editorial office: Harborside Financial Center, 201 Plaza Three, Jersey City, NJ 07311-3881. Printing and mailing paid by the private companies practice section (PCPS) of the AICPA division for CPA firms. Opinions of the authors are their own and do not necessarily reflect policies of the Institute.

Editor: Graham G. Goddard

Highlights of Recent Pronouncements

FASB Statements of Financial Accounting Standards

No. 124 (November 1995), *Accounting for Certain Investments Held by Not-for-Profit Organizations*

☐ Establishes:
1) Standards for accounting for certain investments held by not-for-profit organizations;
2) Standards for reporting losses on investments held because of a donor's stipulation to invest a gift in perpetuity or for a specified term;
3) That provisions in the AICPA Industry Audit Guides *Audits of Colleges and Universities* and *Audits of Voluntary Health and Welfare Organizations*, and the Audit and Accounting Guides *Audits of Providers of Health Care Services* and *Audits of Certain Nonprofit Organizations*, that are inconsistent with this Statement are no longer acceptable specialized accounting and reporting principles and practices.

☐ Requires:
1) That investments in equity services with readily determinable fair values and all investments in debt securities be reported at fair value with gains and losses included in a statement of activities;
2) Certain disclosures about investments held by not-for-profit organizations and the return on those investments.

☐ Effective for fiscal years beginning after December 15, 1995, and interim periods within those fiscal years. Earlier application is encouraged.

No. 123 (October 1995), *Accounting for Stock-Based Compensation*

☐ Supersedes:
1) FASB Technical Bulletin no. 82-2, *Accounting for the Conversion of Stock Options into Incentive Stock Options as a Result of the Economic Recovery Tax Act of 1981*;
2) The disclosure requirements of paragraph 19 of APB Opinion no. 25, *Accounting for Stock Issued to Employees*.

☐ Amends various other accounting pronouncements.

☐ Establishes:
1) A fair value based method of accounting for stock-based compensation plans and encourages entities to adopt that method in place of the provisions of APB Opinion no. 25 for all arrangements under which employees receive shares of stock or other equity instruments of the employer or the employer incurs liabilities to employees in amounts based on the price of the stock;
2) Fair value as the measurement basis for transactions in which an entity acquires goods or services from nonemployees in exchange for equity instruments.

☐ Requires that an employer's financial statements include certain disclosures about stock-based employee compensation arrangements regardless of the method used to account for them.

☐ Effective date:
1) Accounting requirements are effective for transactions entered into in fiscal years that begin after December 15, 1995, though they may be adopted on issuance.
2) Disclosure requirements are effective for financial statements for fiscal years beginning after December 15, 1995, or for an earlier fiscal year for which this Statement is initially adopted for recognizing compensation cost.

Statements on Auditing Standards

No. 79 (December 1995), *Amendment to Statement on Auditing Standards No. 58*, Reports on Audited Financial Statements

☐ Amends SAS no. 58, *Reports on Audited Financial Statements*, to eliminate the requirement that, when certain criteria are met, the auditor add an uncertainties explanatory paragraph to the auditor's report.

☐ Clarifies and reorganizes the guidance in SAS no. 58 concerning emphasis paragraphs, uncertainties, and disclaimers of opinion.

☐ Effective for reports issued or reissued on or after February 29, 1996. Earlier application is encouraged.

No. 78 (December 1995), *Consideration of Internal Control in a Financial Statement Audit: An Amendment to SAS No. 55*

☐ Amends:
1) SAS no. 55, *Consideration of the Internal Control Structure in a Financial Statement Audit*, to recognize the definition and description of internal control contained in *Internal Control—Integrated Framework*, published by the Committee of Sponsoring Organizations of the Treadway Commission, to provide timely and useful guidance to auditors;
2) SAS no. 1, section 110, *Responsibilities and Functions of the Independent Auditor*;

3) SAS no. 70, *Reports on the Processing of Transactions by Service Organizations*;
4) SAS no. 60, *Communication of Internal Control Structure Related Matters Noted in an Audit*.

☐ Effective for audits of financial statements for periods beginning on or after January 1, 1997, and for service auditor's reports covering descriptions as of or after January 1, 1997. Earlier application is encouraged.

No. 77 (November 1995), *Amendments to Statements on Auditing Standards no. 22,* Planning and Supervision, *no. 59,* The Auditor's Consideration of an Entity's Ability to Continue as a Going Concern, and *no. 62,* Special Reports

☐ Amends:
1) SAS no. 22 to clarify that a written audit program should be prepared for all audits, effective for engagements beginning after December 15, 1995;
2) SAS no. 59 to preclude the auditor from using conditional language in the auditor's conclusion about the entity's ability to continue as a going concern in a going-concern explanatory paragraph, effective for reports issued after December 15, 1995;
3) SAS no. 62 to preclude general distribution of audited financial statements prepared in accordance with the requirements of financial reporting provisions of a government regulatory agency pursuant to SAS no. 62, effective for audits of financial statements for periods ended on or after December 31, 1996.

Statements on Standards for Attestation Engagements

No. 6 (December 1995), *Reporting on an Entity's Internal Control Over Financial Reporting: An Amendment to Statement on Standards for Attestation Engagements No. 2*

☐ Amends Statement on Standards for Attestation Engagements No. 2, Reporting on an Entity's Internal Control Structure Over Financial Reporting.

☐ Conforms the description of elements of an entity's internal control to the components of internal control contained in SAS no. 78, *Consideration of Internal Control in a Financial Statement Audit: An Amendment to SAS No. 55,* and *Internal Control—Integrated Framework*.

☐ Effective for an examination of management's assertion when the assertion is as of or for the period ending on December 15, 1996, or thereafter. Earlier application is encouraged.

No. 5 (November 1995), *Amendment to Statement on Standards for Attestation Engagements No. 1,* Attestation Standards

☐ Provides guidance on the quantity, type, and content of working papers for attestation engagements.

☐ Effective for engagements beginning after December 15, 1995.

Statements of Position

No. 95-5 (December 1995), *Auditor's Reporting on Statutory Financial Statements of Insurance Enterprises*

☐ Supersedes SOP 90-10, *Reports on Audited Financial Statements of Property and Liability Insurance Companies*.

☐ Amends:
1) Chapter 9, "Auditor's Reports," of the AICPA Audit and Accounting Guide *Audits of Property and Liability Insurance Companies*;
2) Chapter 11, "Auditors' Reports," of the AICPA Industry Audit Guide *Audits of Stock Life Insurance Companies*.

☐ Discusses:
1) Matters auditors should include in their reports when issuing limited or general distribution reports on statutory financial statements;
2) Matters auditors should evaluate when considering issuing limited distribution reports on statutory financial statements;
3) Auditor's reporting on the statutory financial statements of mutual life insurance enterprises.

☐ Effective for audits of statutory financial statements for years ended on or after December 31, 1996.

No. 95-4 (November 1995), *Letters for State Insurance Regulators to Comply With the NAIC Model Audit Rule*

☐ Amends:
1) Chapter 9, "Auditor's Reports," of the AICPA Audit and Accounting Guide *Audits of Property and Liability Insurance Companies*;
2) Chapter 11, "Auditors' Reports," of the AICPA Industry Audit Guide *Audits of Stock Life Insurance Companies*.

☐ Provides guidance to auditors on the form and content of communications with state insurance regulators.

☐ Effective for audits of statutory financial statements performed for periods ending on or after December 15, 1995. Earlier application is encouraged.

Your Voice in Washington

AICPA examines economic impact of federal income tax alternatives

Early last month, the AICPA released a comprehensive study of the main proposed alternatives to the current federal income tax system. The AICPA study, *Flat Taxes and Consumption Taxes: A Guide to the Debate*, analyzes the overall economic issues that could profoundly reshape the way American businesses invest and raise capital, the way individuals plan and save for retirement, and the way the federal government collects and allocates revenues.

Specifically, the AICPA report:

- ☐ Explains the four basic types of consumption taxes and describes House Majority Leader Dick Armey's Flat Tax and Senators Sam Nunn (D-GA) and Pete Domenici's (R-NM) Unlimited Savings Allowance (USA) Tax.
- ☐ Analyzes the overall effect of each proposal on various business and industrial sectors.
- ☐ Quantifies redistribution of business tax which could occur under different reform alternatives.
- ☐ Examines the impact on financial statements of replacing the income tax system with a consumption tax. (For example, without transition relief a consumption tax could eliminate total corporate profits in any one year and reduce shareholders' equity).
- ☐ Reviews the implication of a consumption tax on international trade.
- ☐ Compares the impact on individuals at various income levels and outlines methods for offsetting the regressive nature of a consumption tax.
- ☐ Explores the treatment of mortgage interest under a consumption tax.
- ☐ Addresses concerns related to a consumption tax for state and local governments and charitable organizations.
- ☐ Poses detailed questions for individuals, businesses, state and local governments, economists and politicians to consider the specific impact of each proposal.

To purchase a copy of *Flat Taxes and Consumption Taxes: A Guide to the Debate*, product no. 061045, cost $25.50 (members), $29.95 (nonmembers), call (800) TO-AICPA. Ask for operator PC.

Securities litigation reform bill now law

CPAs and other members of the business community won a big victory in December when Congress overrode President Clinton's veto of H.R. 1058, the securities litigation reform bill, strongly supported by the AICPA. The legislation (H.R. 1058) became law as soon as the veto was overridden. ☑

Assessing Client Satisfaction

Like it or not, our performances as professionals are measured by our clients. Studies show that what clients really measure is the effort involved. They naturally expect results. It follows that the key to the satisfactory delivery of effort is to manage clients' expectations.

For example, the client who asks us to handle a simple, routine matter and is told, "no problem," might be justified in wondering why the bill is more than "no problem" would seem to warrant; or why the time frame is longer than "no problem" indicated. When we think about complaints clients commonly bring against professionals, we realize these frequently concern matters related to expectation management.

The way to successfully manage clients' expectations is to ensure there are no surprises for the clients. Clients should have a sense of the procedures necessary, the time involved, the level of attention the matter will receive, and should be kept aware of how a given situation is progressing.

If we accept the thesis that client satisfaction depends on the relationship between the client's original expectations regarding our performance and our actual performance, it follows that the more we participate in the shaping of reasonable expectations that we can meet or even surpass, the better will be the client's perception of our performance.

To manage expectations, we need to

- ☐ Test the client's desire and commitment to proceed from overview to resolution of the problem.
- ☐ Describe in detail the steps involved in solving the problem. To make sure the client understands nature of the effort required, some practitioners have gone to the extent of preparing flowcharts of the sequential steps and writing booklets containing answers to commonly asked questions.
- ☐ Explain the complexity of obstacles that may have to be overcome. A matter may seem routine to the CPA, who may then understate its difficulty. This invites fee resistance. When you identify potential hurdles, clients are more appreciative of the nature of tasks to be performed.
- ☐ Convey the timeframes for the various steps involved. Time is clearly a critical aspect in the measurement of performance. Making sure the client knows the reasons for the time involved will reduce anxiety and the need for the client to "check up on things."
- ☐ Confirm that the client correctly understands the value of the engagement, the steps involved, the complexity of obstacles, and the timeframe for

finding a solution to the problem. Invite questions and comments throughout the engagement to show your concern and respect.

Assessing client satisfaction may be accomplished via personal visits, questionnaires, correspondence, and third-party inquiries. Whatever the method, it is important to ascertain what the client's original expectations were, and to ask the client to compare these with the actual experience. Then you should follow up to deal with any negative contrasts and demonstrate a commitment to achieving positive contrasts in the future by surpassing the client's expectations. ☑

—by **Gerald A. Riskin and Patrick J. McKenna,** *The Edge Group, Box 700, 21 Standard Life Center, 10405 Jasper Avenue, Edmonton, Alberta, Canada C5J3S2, tel. and FAX (800) 944-3343*

Questions for the Speaker (Client satisfaction surveys)

What is your opinion of client satisfaction surveys? Lucy R. Carter, a Goodlettsville, Tennessee, practitioner, includes a satisfaction survey with every tax return that goes to a client. She says, "We started doing this last year in order to find out what clients think we are doing well and vice versa."

Ms. Carter says there are two questions at the bottom of the survey—"Would you consider referring us to someone else?" and "If so, to whom would you refer us?" She says several clients have responded "Yes we would. By the way, call so and so company." So the survey is not only eliciting valuable feedback but prodding clients into referrals, too.

Ms. Carter says some responses are signed, while others are anonymous. This does not seem to make any difference in whether the responses contain glowing remarks or complaints, however.

Stephen Weinstein, CPA, a practice management consultant in Stony Creek, Connecticut, says some firms conduct a satisfaction review at a meeting with the client after an engagement. He says this takes time but is an excellent way to obtain meaningful feedback.

Mr. Weinstein says a mail survey will give you an idea of how satisfied clients are with your services, but you can only expect 3 percent to 4 percent of the clients surveyed to respond. He says that no matter which method of conducting client satisfaction surveys you use, make sure you follow up. You could lose more than you gained, if not. ☑

Learning from Our Peers

My partner and I attended the AICPA Small firm Conference in Scottsdale last year. We realize that the improvement of our firm is a constant, unending process and find participation at the small firm conferences, which we combine with our annual retreat, is a great way to exchange ideas with our peers and review trends. While I recognize that what has worked for us may not work for other firms, I would like to share the following ideas that we first learned about at these conferences.

Limit services. Don't try to be all things to all people. Decide what your firm does well, or would like to do, and restrict your services to those areas. You will find it easier to be proficient and efficient if you concentrate on a few services and industries.

This is not a new idea, but many small firms still try to provide too many services. One note of caution, however. It may take several years to limit your work and phase out inappropriate clients.

Act as quarterback. Make sure your clients understand that you can assist with all their financial needs, although you may not provide all the services yourself. Develop a working relationship with other professionals so you can assemble a team for your clients.

This may mean working with other CPAs who specialize in certain areas. Let clients know they should come to you first for advice or with their problems and that you will find the best way to assist them.

Obtain retainers. Before beginning work for a new client or for clients who habitually pay late, collect at least part of the fee in advance. A retainer provides a commitment from the client and shows some willingness and ability to pay.

We have found that if a potential client is unwilling to pay a reasonable retainer, that is a sign there could be future collection problems.

Terminate clients. Too often, we are willing to put up with the same problems from the same clients, year after year. If there are clients whom you cannot upgrade to be the type of client with whom you wish to work, you will do both yourself and the client a favor by ending the relationship. This requires thoughtful preparation and can be accomplished via a letter, telephone call, or a meeting. Your relationship with the client may determine the method.

We have found that a letter, followed by a meeting, is often best. We also try to help place terminated clients with another CPA with whom they may be better suited. Let me emphasize that we have often terminated profitable clients because they did not fit into our service niche.

Use technology. Practitioners in smaller firms have an advantage over those in larger firms in the area of technology. We are able to adapt faster to technological changes.

As computers become more integrated and efficient, we are able to do more work with fewer staff. The savings in labor costs pays for the investment in new technology. To be an investment and not a cost, however, the use of technology must be well planned and implemented.

Have a dream. What vision do you have for your firm? If you have tangible goals, you can achieve them. Do what you enjoy. Get rid of the work you don't enjoy doing. We are all more productive when we work with people we like and provide the type of services we enjoy providing.

I do not believe that improving one's quality of life in this way means making less money. In fact, I believe it will result in more profit for both client and CPA. Before your next client visit, read *Raving Fans* by Ken Blanchard, and give some of the ideas I have just described consideration. As I mentioned at the outset, they may not suit every practice but they have certainly worked for us. ☑

—by **Kevin R. Whitacre, CPA**, *Whitacre, Hall & Co., P.C., 3125 Dandy Trail, Indianapolis, Indiana 46214, tel. (317) 298-0050, FAX (317) 298-0060*

Editor's note: Mr. Whitacre says he would appreciate hearing from other practitioners who have implemented some of these ideas. We would like to encourage practitioners to do this. Your experiences can form the basis for practical articles for future issues of the Practicing CPA.

PCPS Update

This year, the private companies practice section (PCPS) of the AICPA division for CPA firms will sponsor a more detailed directory of member firms. The new directory—due out in April—will be expanded to include firm office addresses and telephone and FAX numbers. A request for this information has been sent to PCPS and SECPS member firms.

The annual PCPS *Firm-on-Firm Review Directory* was recently sent to all practice units. The publication lists PCPS member firms that have expressed interest in performing peer reviews. For an additional copy of the directory, call (800) CPA-FIRM.

Workforce for the Future

(continued from page 2)

Staff members know what is expected of them. They know everyone has to have a high percentage of charge time and that they are expected to make their individual budgets. They all know what their charge hour budget is, where they stand, whether they are over or under, and that this issue is important. At Clifton, Gunderson & Co., part of every manager's compensation is tied into the local office's profitability.

Managing the staff

Many younger people's value systems are different from mine and most older partners. They expect to enjoy life outside public accounting, don't want to work overtime, and have different loyalties. They look at their job solely as a job.

We don't have a dating policy and "up or out" is no longer the rule at Clifton, Gunderson & Co. We will try to retain a manager who has a particular skill in tax or auditing if that does not impede the progress of staff with partner potential. Not making partner is not a problem with some staff.

Turnover is costly when you consider the investment made in each person in the form of CPE, on-the-job training, and so on. If we had to take a write-off when someone left the firm, we would probably have a different attitude about losing such an expensive asset. The shortage of staff in the next five or six years is going to be a serious problem for all of us. We really must make every effort to retain the people we have right now.

Motivation is key to retention. We conduct firm-wide motivational and morale surveys every three years. We rank all the offices and compare them with our national database for CPA firms. We ask open-ended questions to find out what people like most about working at Clifton, Gunderson & Co. and what they like the least. The number one item of interest to most people is where they fit in and what the future holds for them. They are looking for opportunities.

People need to be informed. They need information that is important to their careers and to know where they stand personally. So, tell them if you are having a good year. Let them know how the firm is doing.

We give staff this information. Everyone receives a copy of the firm's financial statements. We spend a lot of time at staff meetings telling people about client situations, what we have to do, where the push is, and why something is important.

We tell people what is important to their careers and about the status of the strategic plan. They already know what we said we were going to do at the beginning of the year, so we give them a progress report. We send the information to employees' homes because we want their spouses to know the results of the demands we put on staff.

We only have two layers of management at Clifton, Gunderson & Co.—firm administrative staff and the partners in charge of local offices (PICs). The PIC has the responsibility for the care and feeding of staff. This means more than just having an open-door policy. It entails listening to people, appreciating their efforts, and getting to know them. Taking staff to lunch should be a routine activity.

We are building this type of workforce for economic reasons. Excessive overtime during tax season and trying to create work in the summer make no sense. More flexible work arrangements do. Construction companies and retailers have known this for years. The key is that people aren't hired for one season. They come back year after year. Retention is extraordinary. We now have this stable workforce of part-time staff to help us out.

Our employees love the flexibility. They know it is part of our firm culture and that part-time status is not a career-limiting option. We try to work with staff where possible, but only if this is in the best interests of our clients and firm. While it is a more difficult workforce to manage, we certainly gain in a crisis or with a special engagement by having part-time staff available. We believe we are building the ideal workforce for the future. ☑

—by **J. Curt Mingle, CPA,** *Clifton, Gunderson & Co., P.O. Box 558, Ephraim, Wisconsin 54211, tel. and FAX (414) 854-4265*

AICPA
American Institute of Certified Public Accountants

Private Companies Practice Section

1211 Avenue of the Americas
New York, N.Y. 10036-8775
(212) 596-6200
Fax (212) 596-6213

Non-Profit Organization
ZIP + 4 BARCODED
U.S. POSTAGE
PAID
American Institute of
Certified Public Accountants